

**EXHIBIT GG**



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*3075*

June 22, 2007

**VIA FACSIMILE AND U.S. MAIL**

Barbara J. Chisholm  
 Altshuler, Berzon LLP  
 177 Post Street, Suite 300  
 San Francisco, CA 94108

**Re: SEIU, Local 715**

Dear Ms. Chisholm:

I received a copy of your letter to Laurie Quintel, and am responding on her behalf. As has been stated before, the Hospitals are aware that the International decreed a reorganization of the California locals, which directed that Local 715 be merged with other locals to form a regional local, and that it conducted a "statewide vote" on the issue, the announced results of which were an 88% vote in favor. They are aware that it was further decreed that all local unions, union officers and union staff were to fully cooperate in the implementation and transition process to assure that the decision was carried out in an orderly fashion. They are also aware that it was announced through Local 715's website that, effective March 1, 2007, it would become a part of a new local, Local 521. Local 521's website echoed that information, announcing that as of March 1, 2007, five (5) locals, including Local 715, came together to form "one larger, more powerful local," and that the resources of the "legacy unions" were transferred to Local 521 to form that one new union. They are aware that all but the Hospitals' bargaining unit, and a few others slated to be "transferred" to other unions, were clearly subsumed by Local 521 through that merger. The Hospitals have been informed by stewards that Local 715 no longer existed and that the employees were represented by UHW. They since been told by Local 715's former counsel that no transfer to UHW was affected, which thus would leave Local 521 as the only possible putative successor, but they were likewise informed by Local 715's prior counsel that no such transfer of representation rights took place.

You have responded that Local 715 currently has no employees, and no constitution and by-laws. The information you provided with respect to conditions subsequent to the appointment of this trustee is not responsive to the Hospital's request, which relates to a time period prior to the appointment of any trustee.

Since Local 715 came together with four (4) other locals to form one larger, more powerful local, Local 521, it would appear that Local 521 is the successor to Local 715, though not

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Since Local 715 came together with four (4) other locals to form one larger, more powerful local, Local 521, it would appear that Local 521 is the successor to Local 715, though not as to representation rights for the Hospitals' bargaining units. The information requests regarding Local 521's assets and employees, and the request regarding the assets of Local 715, are relevant to the Hospitals' determination concerning the status of Local 715 and the Hospitals' obligations under the certifications issued with respect to the Hospitals' bargaining unit.

The Hospitals still seek the information requested in items 1, 2, 3, 4, 5, 10 and 11 in the request made by letter dated March 29, 2007, which you have declined to provide. Since the request for information was made prior to the appointment of the "trustee," please provide the requested information as of the date of receipt of the March 29 request.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurence R. Arnold".

Laurence R. Arnold

LRA:sey

cc: Laurie Quintel

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**MESSAGE:**